

# **SDMS US EPA REGION V -1**

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DOCUMENTS.**



CERRO COPPER PRODUCTS CO.

P.O. Box 66800

St. Louis, MO 63166-6800

618/337-6000

145311

June 27, 1995

RESPONSE TO 4/24/95 CIL

Chris Cahnovsky  
Bureau of Land  
Illinois Environmental Protection Agency  
2009 Mall Street  
Collinsville, Illinois 62234

163121008--St. Clair County  
Cerro Copper Products Company  
ILD080018914  
Compliance File

Subject: Reinspection Visit - June 21, 1995  
163121008 -- St. Clair County  
Cerro Copper Products Co.  
ILD080018914

Dear Chris:

At the completion of your reinspection visit on June 21, 1995, you requested that we send you a copy of the Special Waste Manifest for the first load of Oily Waste that we shipped off-site separately with a copy of the analytical data for that material. A copy of Manifest Document No. 00001, IL4790164, showing 10 cubic yards of this material being shipped to B.F.I. Modern Landfill is attached with a copy of the analytical results for a sample of this material collected on June 16, 1995. Also included with this letter is a copy of the procedure "HANDLING AND DISPOSAL OF OILY WASTE" and the cover memo for its distribution to all management and supervisory personnel in the operating areas of the plant.

We would hope that our activities in response to your original inspection visit and the resulting "Compliance Inquiry Letter" demonstrate the desire of the Cerro Copper Products Co. management to maintain a position of compliance with the applicable statutes and regulations enforced by the Agency. Should additional information be required, please contact my office or that of Joe D. Burroughs, Environmental Engineer.

Very truly yours,  
CERRO COPPER PRODUCTS CO.

Joseph M. Grana  
Manager of Environmental  
and Energy Affairs

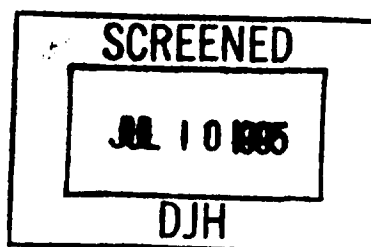
enc. Three each

RECEIVED  
IEPA

JUN 28 1995

COLLINSVILLE OFFICE

cc/6/30



A member of The Marmon Group of companies

## PLEASE TYPE

(Form designed for use on elite (12-pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-89)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

|  |  |  |  |   |   |  |   |
|--|--|--|--|---|---|--|---|
| <b>UNIFORM HAZARDOUS WASTE MANIFEST</b>  |  | 1. Generator's US EPA ID No.   |  | Manifest Document No.                             | 2. Page 1 of 1                          | Information in the shaded areas is not required by Federal law, but is required by Illinois law. |   |
| 3. Generator's Name and Mailing Address<br>CERRO CORP. PRODUCTS CO.<br>P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276  |  | Location If Different<br>1000 MISSISSIPPI AVE<br>SPRINGFIELD, ILLINOIS 62706 |  | A. Illinois Manifest Document Number<br>IL 790164 |   | Fee Paid<br>Application  |   |
| 4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS* 514-235-6000   |  | 5. Transporter 1 Company Name<br>B.F.L. OF SPRINGFIELD                       |  | 6. US EPA ID Number                               | B. Illinois Generator's ID<br>245527000 | C. Illinois Transporter's ID<br>012  |   |
| 7. Transporter 2 Company Name  |  | 8. US EPA ID Number  |  | D. Illinois Transporter's ID<br>1618 235-6000     | Transporter's Phone                     |  |   |
| 9. Designated Facility Name and Site Address<br>M.F.L. MODERN LANDFILL<br>RTE 158 & MINE HAUL ROAD<br>BROOKFIELD, ILLINOIS 60520   |  | 10. US EPA ID Number   |  | E. Illinois Facility's ID<br>1630100022           | Facility's Phone<br>618 235-9625        |  |   |
| 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)   |  |  |  | 12. Containers No.                                | 13. Total Quantity                      | 14. Unit Wt/Vol  | I. Waste No.  |
| a. DANGEROUS WASTE, NON-HAZARDOUS  |  |  |  | 0 0 3   | 1000                                    | Y  | EPA HW Number<br>XX<br>Authorization Number<br>928800 |
| b.   |  |  |  |   |   |  | EPA HW Number<br>XX<br>Authorization Number           |
| c.   |  |  |  |   |   |  | EPA HW Number<br>XX<br>Authorization Number           |
| d.   |  |  |  |   |   |  | EPA HW Number<br>XX<br>Authorization Number           |
|  |  |  |  | Gallons Cubic Yards                               |   |  |   |
| 15. Special Handling Instructions and Additional Information<br>EMERGENCY TELEPHONE NUMBER 514-235-6000<br>P.O. NUMBER 17815   |  |  |  |   |   |  |   |
| 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.<br>If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. |  |  |  |   |   |  |   |
| Printed/Typed Name<br>JOE D. BURROUGHS   |  |  |  | Signature   |   | Date<br>Month Day Year   |   |
| 17. Transporter 1 Acknowledgement of Receipt of Materials  |  |  |  | Printed/Typed Name                                |   | Signature  |   |
| 18. Transporter 2 Acknowledgement of Receipt of Materials  |  |  |  | Printed/Typed Name                                |   | Signature  |   |
| 19. Discrepancy Indication Space   |  |  |  |   |   |  |   |
| 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.   |  |  |  | Printed/Typed Name                                |   | Signature  |   |
|  |  |  |  |   |   | Date<br>Month Day Year   |   |

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 5. GENERATOR MAIL TO IEPA  
(RCRA AND PCB WASTES)

# TEKLAB, INC.

#6 MEADOW HEIGHTS PROF. PARK  
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL & CHEMICAL TESTING

TELE: 618-344-1004  
FAX: 618-344-1005

June 21, 1995

REPORT #11811-1

Mr. Joe Burroughs  
Cerro Copper Products  
Highway #3  
Alton & Southern Tracks  
Sauget, IL 62201

Project: Special Waste Testing  
13696

Sample Received: 06-16-95

|             |             |
|-------------|-------------|
| Sample ID   | JDB061695-1 |
| Sample Date | Oily Waste  |
| Lab ID      | 06-16-95    |
|             | 950616-14   |

## ANALYSIS RESULTS

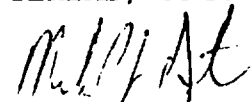
| <u>PARAMETER</u>             | <u>RESULT</u> | <u>REGULATORY LEVEL</u> |
|------------------------------|---------------|-------------------------|
| pH                           | 5.26          | >2/<12.5                |
| Cyanide (Reactive), mg/kg    | <0.12         | <10                     |
| Sulfide (Reactive), mg/kg    | <1            | <10                     |
| Flash Point (Closed Cup), °F | >200          | >140                    |
| Paint Filter                 | PASS          | -----                   |

## TCLP EXTRACT

| <u>CAS NO.</u> | <u>PARAMETER</u> | <u>RESULT</u> | <u>REGULATORY LEVEL</u> |
|----------------|------------------|---------------|-------------------------|
| 7440-38-2      | Arsenic, mg/l    | 0.012         | 5.0                     |
| 7440-39-3      | Barium, mg/l     | 0.4           | 100                     |
| 7440-43-9      | Cadmium, mg/l    | 0.020         | 1.0                     |
| 7440-47-3      | Chromium, mg/l   | <0.03         | 5.0                     |
| 7439-92-1      | Lead, mg/l       | 0.13          | 5.0                     |
| 7439-97-6      | Mercury, mg/l    | <0.0002       | 0.2                     |
| 7782-49-2      | Selenium, mg/l   | <0.002        | 1.0                     |
| 7440-22-4      | Silver, mg/l     | 0.01          | 5.0                     |

These tests were conducted in accordance with "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", U.S. Environmental Protection Agency, SW-846 (Revised 1990).

TEKLAB, INC.



Michael L. Austin  
Director of Operations

# TEKLAB, INC.

#6 MEADOW HEIGHTS PROF. PARK  
COLLINSVILLE, ILLINOIS 62234

ENVIRONMENTAL & CHEMICAL TESTING

TELE: 618-344-1004  
FAX: 618-344-1005

Report # 11811-01

Project: Special Waste Testing

Mr. Joe Burroughs  
Cerro Copper Products  
Highway #3  
Alton & Southern Tracks  
Sauget, IL 62201

Sample ID: JDB061995-1  
Sample Date: 06/16/95

Lab ID: 950616-14 TCLP  
Report Date: 06/21/95

## VOLATILE ORGANICS

SW-846 Method 8260

### Concentration in TCLP Extract

| CAS#        | COMPOUND             | DET. LIMIT | RESULT | UNIT | %SPIKE REC. | REG. LIMITS |
|-------------|----------------------|------------|--------|------|-------------|-------------|
| 000075-01-4 | Vinyl Chloride       | 0.020      | ND     | mg/l | 102         | 0.200       |
| 000075-35-4 | 1,1-Dichloroethene   | 0.050      | ND     | mg/l | 102         | 0.700       |
| 000078-93-3 | 2-Butanone           | 0.100      | ND     | mg/l | 96          | 200         |
| 000067-66-3 | Chloroform           | 0.100      | ND     | mg/l | 105         | 6.00        |
| 000056-23-5 | Carbon Tetrachloride | 0.050      | ND     | mg/l | 105         | 0.500       |
| 000107-02-2 | 1,2-Dichloroethane   | 0.050      | ND     | mg/l | 103         | 0.500       |
| 000071-43-2 | Benzene              | 0.050      | ND     | mg/l | 103         | 0.500       |
| 000079-01-6 | Trichlorethene       | 0.050      | ND     | mg/l | 106         | 0.500       |
| 000127-18-4 | Tetrachloroethene    | 0.050      | ND     | mg/l | 106         | 0.700       |
| 000108-90-7 | Chlorobenzene        | 0.050      | ND     | mg/l | 104         | 100         |
| 000106-46-7 | 1,4-Dichlorobenzene  | 0.050      | ND     | mg/l | 103         | 7.50        |

### SURROGATE COMPOUND RECOVERIES

| Surrogate            | % Recovery | Lower Limit | Upper Limit |
|----------------------|------------|-------------|-------------|
| Dibromofluoromethane | 106        | 86          | 118         |
| Toluene-d8           | 107        | 88          | 110         |
| 4-Bromofluorobenzene | 109        | 86          | 115         |

TCLP Extraction Date: 06/18/95  
Analysis Date: 06/21/95  
Analyst: Chip Lewis

TEKLAB, Inc.

Tony A. Lynn

Laboratory Director

000100

**REPORT # 11811-01**

Mr. Joe Burroughs  
Cerro Copper Products  
Highway #3  
Alton & Southern Tracks  
Sauget, IL 62201

PROJECT: SPECIAL WASTE TESTING

SAMPLE ID: JDB061695-1  
SAMPLE DATE: 06/16/95

LAB I.D.: 950616-14 TCLP  
REPORT DATE: 06/22/95

**SEMI-VOLATILE ORGANICS**  
**SW-846 METHOD 8270**  
**CONCENTRATION IN TCLP EXTRACT**

| <u>CAS #</u> | <u>COMPOUND</u>       | <u>DET. LIMIT</u> | <u>RESULT</u> | <u>UNIT</u> | <u>% SPIKE REC.</u> | <u>REG. LIMIT</u> |
|--------------|-----------------------|-------------------|---------------|-------------|---------------------|-------------------|
| 000110-86-1  | Pyridine              | 0.200             | ND            | mg/l        | 54                  | 5.00              |
| 000095-48-7  | o-Cresol              | 0.200             | ND            | mg/l        | 49                  | 200               |
| 000106-44-5  | m,p-Cresol            | 0.200             | ND            | mg/l        | 56                  | 200               |
| 000067-72-1  | Hexachloroethane      | 0.500             | ND            | mg/l        | 33                  | 3.00              |
| 000098-95-3  | Nitrobenzene          | 0.100             | ND            | mg/l        | 35                  | 2.00              |
| 000087-68-3  | Hexachlorobutadiene   | 0.100             | ND            | mg/l        | 24                  | 0.50              |
| 000088-06-2  | 2,4,6-Trichlorophenol | 0.100             | ND            | mg/l        | 41                  | 2.00              |
| 000095-95-4  | 2,4,5-Trichlorophenol | 0.100             | ND            | mg/l        | 45                  | 400               |
| 000121-14-2  | 2,4-Dinitrotoluene    | 0.100             | ND            | mg/l        | 50                  | 0.13              |
| 000118-74-1  | Hexachlorobenzene     | 0.100             | ND            | mg/l        | 77                  | 0.13              |
| 000087-86-5  | Pentachlorophenol     | 0.500             | ND            | mg/l        | 63                  | 100               |

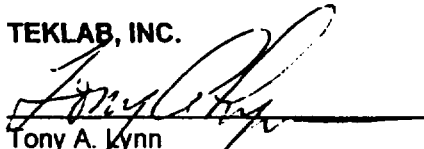
ND = BELOW DETECTION LIMIT

**SURROGATE STANDARD RECOVERIES**

| <u>COMPOUND</u>      | <u>% RECOVERY</u> | <u>LOWER LIMIT</u> | <u>UPPER LIMIT</u> |
|----------------------|-------------------|--------------------|--------------------|
| 2-Fluorophenol       | 71                | 21                 | 100                |
| Phenol-d5            | 68                | 10                 | 100                |
| Nitrobenzene-d5      | 75                | 35                 | 114                |
| 2-Fluorobiphenyl     | 50                | 43                 | 116                |
| 2,4,6-Tribromophenol | 55                | 10                 | 123                |
| p-Terphenyl-d14      | 85                | 33                 | 141                |

TCLP Extract Date: 06/17/95  
Sample Extraction Date: 06/20/95  
Analysis Date: 06/22/95  
Analyst: Chip Lewis

TEKLAB, INC.



Tony A. Lynn

Page 1 of 1 Laboratory Director

CERRO COPPER PRODUCTS CO.

INTERNAL MEMORANDUM

Other Addressees:

R. E. Conreaux

J. M. Grana

DISTRIBUTION ATTACHED

File:

To: M. McNerney  
J. L. Sundstrom  
E. Perschbacher  
E. T. Cornwell

Date: June 26, 1995


From: J. D. Burroughs

Subject: Oily Waste Handling and Disposal

The disposal of oily waste materials must be accomplished separately from that of the ordinary trash and rubbish. This material can be land filled but must be handled as an Illinois Special Waste. To facilitate this separation and proper handling of the oily waste we have brought on-site a covered roll-off box and spotted it at Reclamation and this box has been in use over the last month. We have also received eight steel boxes which will be located at strategic locations throughout the plant to make it easier to segregate the material as a clean up involving oily waste is completed. These boxes are to be painted by our painters and identified by our painters and they will be spotted as each is ready.

Attached is a procedure which is to be posted to inform your personnel of the description and proper handling of oily waste. Your personnel are to be instructed regarding the proper handling of this material and directed to periodically review the procedure.

If there are any questions or problems, contact my office.



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## HANDLING AND DISPOSAL OF OILY WASTE

The proper disposal of oily waste requires segregation of this material from the ordinary trash and rubbish generated and this will be best accomplished by making the separation as the oily waste is generated. Proper segregation will also help minimize the amount of material which must be handled as Special Waste.

OILY WASTE is any waste material which has been used to absorb oil or which has otherwise been coated or saturated with oil. This would include:

1. Used oil dry material,
2. Used oil absorbent socks, pillows, and sheets,
3. Oil saturated or coated rubbish or trash (paper, cardboard, wood, pallets, etc.),
4. Any other material which would normally be placed in the compactor or open top container for disposal as trash or rubbish but which is saturated or coated with oil.

MATERIAL PLACED IN OILY WASTE CONTAINERS MUST NOT CONTAIN ANY FREE LIQUIDS (NO OIL SHOULD RUN OFF THE MATERIAL AS IT IS HANDLED)

The container for removing oily waste off-site is a covered roll-off box located at the Material Reclamation Area. There are eight other boxes painted green and marked for oily waste only spotted at easily accessible locations around the plant for smaller quantities of such material. These smaller boxes will be emptied by the Reclamation Operator on an as needed basis. The locations will be:

1. Tube Mill - Block Line
2. Tube Mill - Lean-To No. 1
3. Tube Mill - Extrusion Bay
4. Tube Mill - Brass Mill
5. Anode/Tankhouse
6. Building 19
7. Metal Receiving
8. Tube Mill - Building 80

Contact the Reclamation Operator or Supervisor or the Environmental Department if there are any questions or problems.